

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA)
)
v.) Criminal No. 2:14cr139
)
CHRISTIAN ADAM LANE,)
)
Defendant.)

**DEFENDANT’S MOTION *IN LIMINE* TO
EXCLUDE EVIDENCE OF OTHER BAD ACTS**

COMES NOW the Defendant, CHRISTIAN ADAM LANE, by and through counsel, pursuant to Federal Rules of Evidence 403 and 404(b), and moves this Honorable Court *in limine* to exclude from trial of this case certain evidence concerning Defendant's alleged bad acts. In particular, Defendant seeks the exclusion of any bad acts that occur outside the May 2014 time period referenced in the Indictment. In support thereof, Defendant submits the attached memorandum.

WHEREFORE, the Defendant, CHRISTIAN ADAM LANE, respectfully requests the relief sought herein.

Respectfully Submitted,

CHRISTIAN ADAM LANE

By: /s/
Catherine M. Six, Esquire
Virginia State Bar No. 38289
Counsel for Christian Adam Lane
Law Office of Catherine MacLean Six, P.C.
381 Edwin Drive, Suite 100
Virginia Beach, VA 23462
Telephone: (757) 716-3888
Facsimile: (757) 352-2220
csix@sixlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November, 2014, I have electronically filed the foregoing Motion with the Clerk of Court and served a true copy thereof via the CM/ECF system upon the following counsel of record:

Kevin M. Comstock
United States Attorney's Office
101 W. Main Street, Suite 800
Norfolk, VA 23510
Telephone: (757) 441-6331
Facsimile: (757)441-6689
Kevin.Comstock@usdoj.gov

Benjamin Harrison Hamlet
1200 Sparrow Road
Chesapeake, VA 23325
Telephone: (757) 424-2803
Facsimile: (757)424-0879
ben@hamletlawfirm.com
Counsel for Stephen Wheeler

_____/s/
Catherine M. Six
Virginia State Bar No. 38289
Counsel for Christian Adam Lane
Law Office of Catherine MacLean Six, P.C.
381 Edwin Drive, Suite 100
Virginia Beach, VA 23462
Telephone: (757) 716-3888
Facsimile: (757) 352-2220
csix@sixlaw.com